



0000001 177740  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 04 1997

SE-5J

**MEMORANDUM**

**DATE:**

**SUBJECT:** ACTION MEMORANDUM - Request for a Time Critical Removal Action at the South Indiana Avenue Vacant Lot Site, Chicago, Cook County, Illinois.

**FROM:** Cindy Nolan, On-Scene Coordinator *Donald J. Bruce*  
*for* Emergency Response Section II

**THRU:** Richard Karl, Chief *Donald J. Bruce*  
*for* Emergency Response Branch

**TO:** William E. Muno, Director  
Superfund Division

Site ID # B507

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document approval to expend up to \$205,318 to abate an imminent and substantial threat to public health and the environment presented at the South Indiana Avenue Vacant Lot site, Cook County, Chicago, Illinois.

The site was referred to the United States Environmental Protection Agency (U.S. EPA) by the City of Chicago Department of Environment, and the Illinois Environmental Protection Agency for a removal assessment. As a result of the assessment the site was recommended for a removal action.

The proposed removal action seeks to abate the imminent and substantial threat to human health and the environment posed by the presence of wastes at the site in waste piles, drums and various other containers. The proposed removal action seeks to eliminate this threat by removing and disposing of the waste. It is estimated that the removal action will require approximately 22 on-site working days to complete. This proposed removal action is considered time critical due to the presence of approximately 50 to 60 abandoned drums that contain waste material.

The site is not included on the National Priorities List (N.P.L.).

## II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # IL0002009397

### Site Description and Background

The South Indiana Avenue site is a vacant lot located 41° 49' 06" north latitude and 87° 37' 17" west longitude, Chicago, Illinois (Fig. 1). The site is also located in an economically disadvantaged minority community. The site consists of approximately 50 to 60 drums of various shapes and levels of structural integrity, and is bordered on two sides by a fence next to a vacant building. (Fig. 2) The remaining side of the site is open, allowing easy access for people to enter the site. To the west of the site is a vacant lot that local residents are using to repair vehicles. The site is in a mixed residential/industrial area.

On June 26, 1997, On-Scene Coordinator (OSC) Cindy Nolan assessed conditions at the site. On July 8, 1997, U.S. EPA Representative Keith J. Lesniak along with Superfund Technical Assessment and Response Team (START) members Chad Gibson and Raghu Nagam performed sampling at the site. The assessment team observed waste piles, drums and other containers present on site.

### Current Site Conditions

Approximately 50 to 60 drums and various other containers are scattered throughout the site. Some of the drums contain liquid or solid materials, and some are empty.

During the July 8, 1997 site assessment, the assessment team collected three samples from various media on the site. Analytical results from these samples are as follows: Samples D-1 and D-2 exhibited flash points between 70°F and 80°F and pH for samples D-1 and D-2 were found to be between 5.7 and 4.3 standard units. Highest concentrations of concern were detected for toluene, xylene, and lead with maximum levels of 100,000 mg/kg, 420,000 mg/kg, and 1,400 mg/kg. Contamination may also exist in soil on a portion of the property at 131 E. 43rd St. (PIN 20 03 302 025) and 119 E. 43rd St. (PIN 20 03 302 010); additional samples will be collected.

### State and Local Authorities Role

The City of Chicago and the Illinois Environmental Protection Agency (IEPA) do not have sufficient funds or resources to conduct the removal of the hazardous substances found at this facility. The IEPA does not have a removal program in place with enough funds to perform the actions needed at this site to mitigate the threat to human health and the environment. The IEPA will continue to provide support to U.S. EPA during the removal efforts.

### III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions present at the South Indiana Avenue Vacant Lot site constitute an imminent and substantial threat to public health and the environment, based upon considerations as set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Section 300.415(b)(2). Accordingly, a time-critical removal action is the appropriate response action at the South Indiana Avenue site. These conditions include, but are not limited to, the following:

- a) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or the food chain;

Analytical results from the drum samples collected on July 8, 1997, indicate the presence of hazardous substances at the South Indiana Vacant Lot site. Samples D-1 and D-2 indicate elevated concentrations for toluene, xylene, and lead with maximum levels of 110,000 mg/kg, 420,000 mg/kg, and 1,400 mg/kg respectively. The potential exists for trespassers, vandals, or scavengers to come in contact with hazardous substances, especially from deteriorated drums in exposed areas.

- b) Threat of fire or explosion;

The site investigation conducted by U.S. EPA documented that approximately 50 to 60 drums and other containers full or partially full of hazardous waste and unknown material are present on-site in uncontrolled, deteriorating, and leaking conditions. Drum Samples #1 and #2 have flash points up to 80°F and according to 40 CFR § 261.21(a)(1), a flash point less than 140°F exhibits the characteristic of ignitability. Site access to trespassers, vandals, and scavengers is unrestricted. There are no existing gates or locks to restrict entrance to the property.

- c) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Samples collected by the U.S. EPA indicate that hazardous materials are present on site. The drums contain levels of toluene, xylene, and lead that are above their inhalation exposure and fire/explosion limits. Dermal exposure can cause skin damage and eye irritation. Many of the unsampled containers potentially contain hazardous materials or other ignitable liquids. The integrity of the drums are poor and the potential exists for them to further deteriorate.

- d) The availability of other appropriate Federal or local response mechanisms to respond to the release;

The City of Chicago Department of Environment and the Illinois Environmental Protection Agency referred this site to the U.S. EPA, in July of 1997, due to the lack of the necessary resources to undertake the clean up action or to respond to an emergency situation.

- e) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The poor integrity of the drums and containers on site pose the threat of release and/or migration of contaminants. Exposure to the elements can cause further deterioration of the waste containers, which could cause further migration of contaminants if the hazardous substances leaked.

#### **IV. ENDANGERMENT DETERMINATION**

Open drums and containers improperly stored at the South Indiana Avenue Vacant Lot site contain ignitable liquids. These wastes pose potential inhalation, ingestion, and direct contact hazards to surrounding residents.

Given the present site conditions, the nature of hazardous substances on-site, and the potential exposure pathways described in Section III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

#### **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

##### **A. Proposed Actions**

##### **1. Proposed Action Description**

The purpose of this removal action is to mitigate the imminent and substantial threats posed to public health or welfare or the environment from wastes at the site. The proposed immediate response action includes the following actions:

- 1) A site safety plan will be prepared and implemented. The site will be secured to the extent practicable for completion of site activities,
- 2) The contents of waste piles, drums, and any other containers will be segregated, staged, sampled, and categorized for disposal. Compatible waste streams will be bulked and disposed of off-site
- 3) All drums and other containers will be decontaminated, recycled, and/or disposed of as appropriate

Waste transportation and disposal will be handled in full compliance with the U.S. EPA's Off-Site Disposal Rule, 40 CFR Section 300.440, 58 Federal Register 49215. The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

## **2. Contribution to Remedial Performance**

The South Indiana Avenue Vacant Lot site is not on the NPL and remedial actions have not been planned to date. The proposed removal action will address all threats meeting the NCP Section 300.415(b)(2) removal criteria as identified in Section III of this Action Memorandum.

## **3. Applicable or Relevant and Appropriate Requirements (ARARs)**

All Federal ARARs and any Illinois ARARs identified in a timely manner will be complied with to the extent practicable. A letter was sent July 9, 1997 to James O'Brien of IEPA requesting that the state identify any ARARs.

## **4. Project Schedule**

It is estimated that on-site removal activities will be completed in 22, ten hour working days.

## **B. Estimated Costs**

The estimated costs of the recommended action are summarized below. The detailed ERCS contractor costs and initial cost projection scenario are presented in Attachment A. The estimated costs are as follows:

## **REMOVAL PROJECT CEILING ESTIMATE**

### **EXTRAMURAL COSTS**

Clean Up Contractor Costs	\$114,346
Contingency (20%)	22,869
Subtotal	<u>137,215</u>
START	16,690
Extramural Costs	153,865
Extramural Contingency (20%)	30,773
<b>TOTAL, EXTRAMURAL COSTS</b>	<b>\$184,638</b>

### **INTRAMURAL COSTS**

U.S. EPA Direct costs \$30/hr (220 Regional + 22 HQ)	\$7,260
U.S. EPA Indirect Costs \$61/hr (220 Regional Hrs)	13,420
<b>TOTAL, INTRAMURAL COSTS</b>	<b>\$ 20,680</b>

**TOTAL REMOVAL PROJECT CEILING: \$205,318**

## **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

The current site conditions, the nature of the hazardous substances on-site, and the potential exposure pathways to the nearby population described in Sections II and III, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to the public health, or welfare, or the environment. Implementation of the response actions selected in this Action Memorandum will mitigate the actual or threatened releases of hazardous substances from this site.

Without undertaking the aforementioned actions, releases may occur due to rupture of drums and containers within the site premises. Additional spillage to the facility's work area could result in

an overflow of hazardous wastes to the sanitary sewer, street or neighboring properties. A release of wastes to surrounding properties will contribute and ultimately lead to increased risks to public health and the environment.

## VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues for the Indiana Avenue Vacant Lot site.

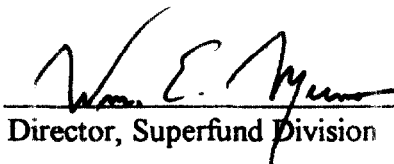
## VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum (Attachment B).

## IX. RECOMMENDATION

This decision document represents the selected removal action for the Indiana Avenue Vacant Lot site, Chicago, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. Conditions at the site meet the criteria of Section 300.415 (b)(2) of the NCP for a removal action and I recommend your approval of the proposed removal action. The total project ceiling requested is \$205,318. Of this, an estimated \$167,948 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE:

  
Director, Superfund Division

DATE: 11/4/97

DISAPPROVE: \_\_\_\_\_

Director, Superfund Division

DATE: \_\_\_\_\_

ATTACHMENTS: A. ERCS Contractor Costs  
B. Enforcement Confidential Addendum  
C. Administrative Record Index  
D. Site Maps

cc: K. Mould, U.S. EPA HQ, 5202G  
D. Henne, U.S. Department of the Interior, Customs House  
200 Chestnut St., Room 217, Philadelphia, PA 19106  
J. O'Brien, IEPA, 2009 Mall St., Collinsville, IL 62234

BCC PAGE

REDACTED

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION



**ATTACHMENT A**

**ERCS CONTRACTOR COSTS  
INDIANA AVENUE VACANT LOT SITE  
SEPTEMBER 1997**

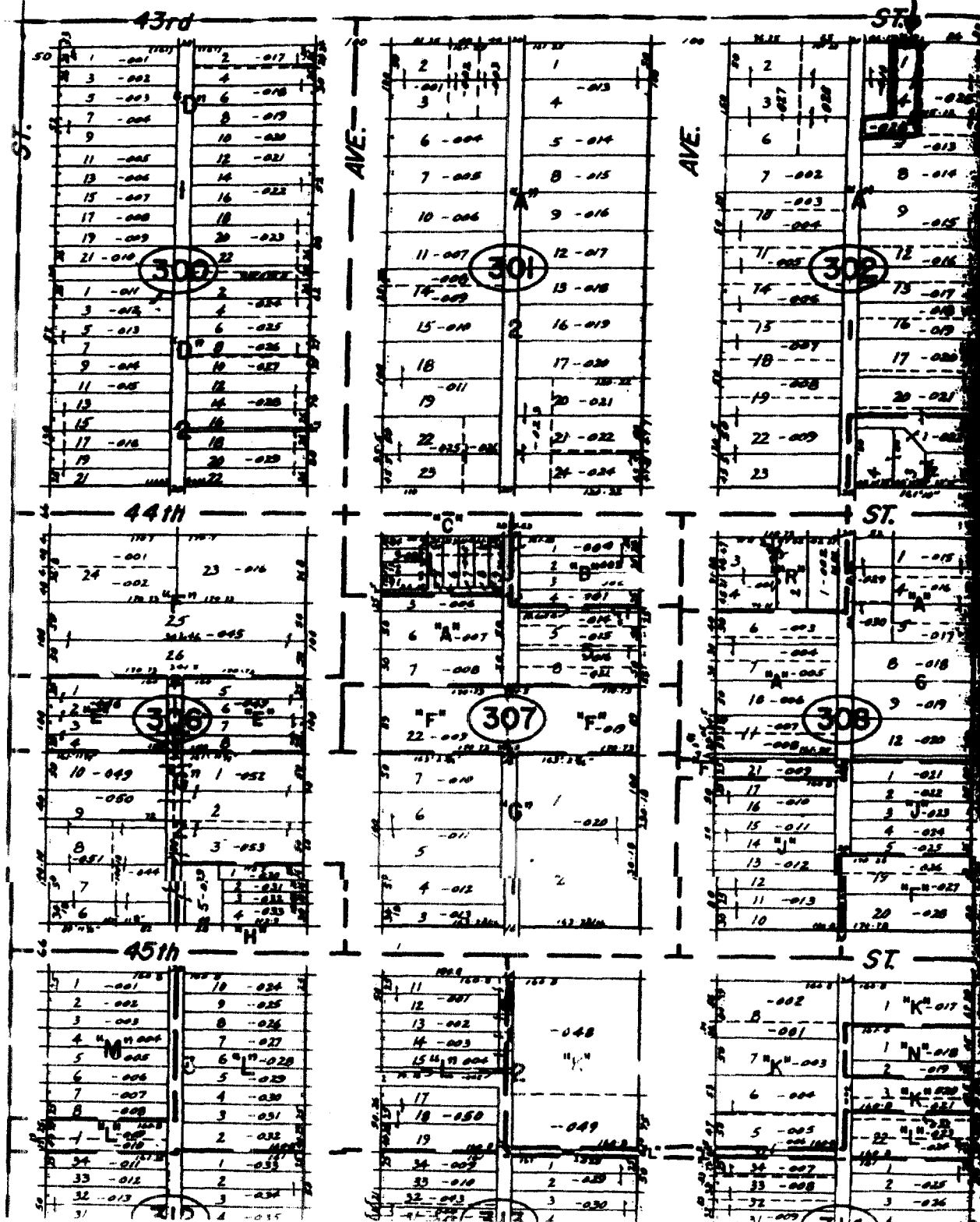
PERSONNEL	\$ 44,106
EQUIPMENT	25,225
MATERIALS	33,215
SUBCONTRACTORS	-0-
TRANSPORTATION	7,000
DISPOSAL	<u>11,000</u>
TOTAL	\$114,346

FIGURE 3. LOCATION OF  
123 E. 43RD ST., CHICAGO, IL

W. 1/2 S.W. 1/4 Sec. 3 - 38 - 14  
HYDE PARK TWP.

123 E. 43RD ST.

of the  
4 of Sec.  
too much  
W.  
500  
he N.  
map's  
1002  
1/2 of  
see map,  
10/  
4 ft. of  
1/4 of  
15  
of the  
1/4 of  
93  
d lands  
76  
N.  
V. 1/2  
16  
Sub.  
24:86  
the N.  
ring E.  
59  
21  
9  
W.  
3  
W. of  
17  
24  
80  
W.  
3  
Sub.  
1911  
1/4  
32  
6 of  
17  
1/4 21  
("A").  
17  
Bik.  
19



ENFORCEMENT CONFIDENTIAL ADDENDUM

REDACTED

(2 PAGES)

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

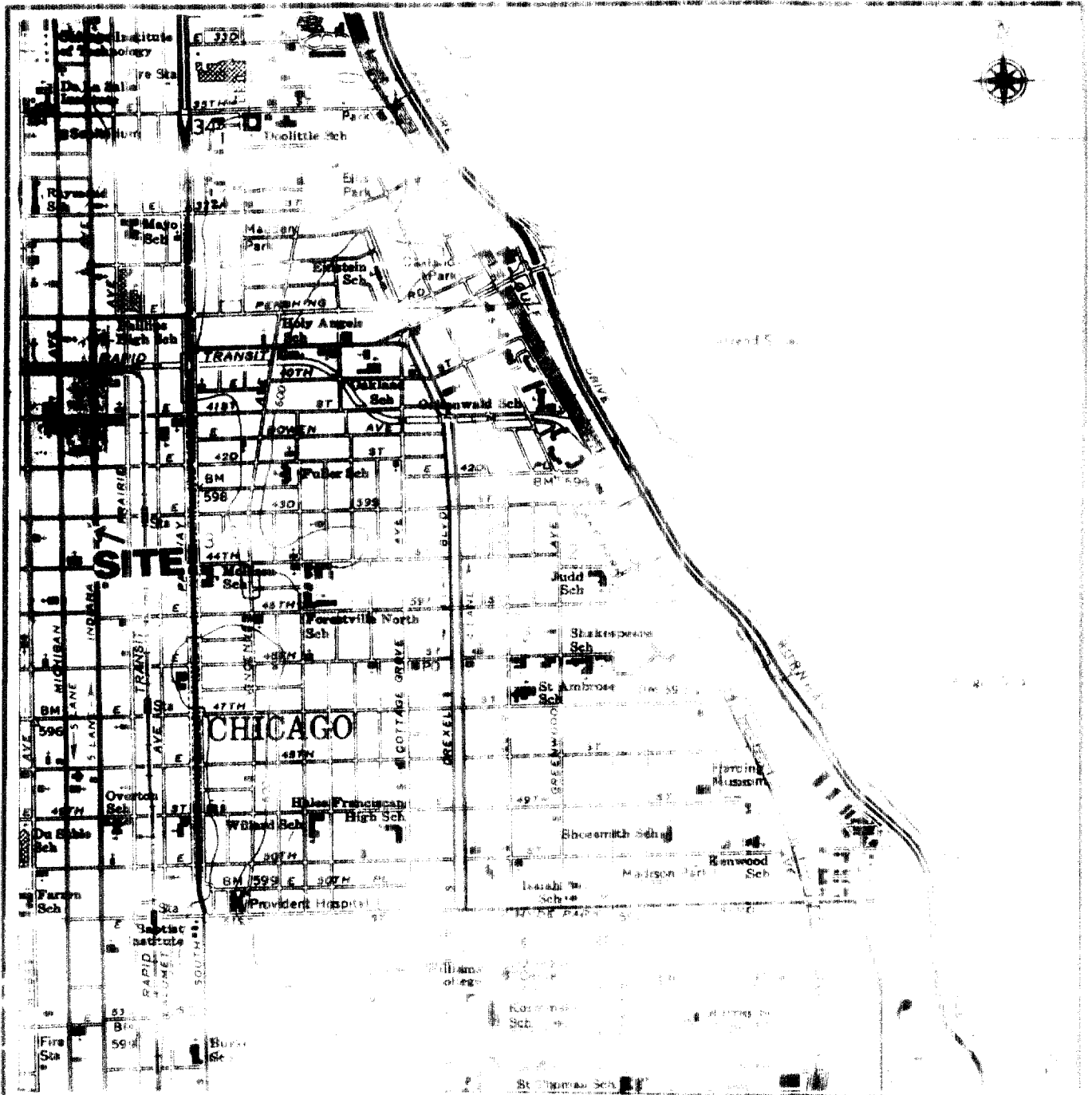
## ATTACHMENT C

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTIONADMINISTRATIVE RECORD  
FOR  
4310 SOUTH INDIANA AVENUE VACANT LOT SITE  
CHICAGO, COOK COUNTY, ILLINOISORIGINAL  
SEPTEMBER 19, 1997

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	00/00/00	Nolan, C. & K. Lesniak; U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the 4310 South Indiana Avenue Vacant Lot Site (PENDING)	

**ATTACHMENT D**

**SITE MAPS**



Location

# **SEPA U.S. EPA Region 5** **EMERGENCY AND ENFORCEMENT RESPONSE BRANCH**

ILLINOIS

TITLE

FIGURE #

SITE

SCALE

DATE

STATE

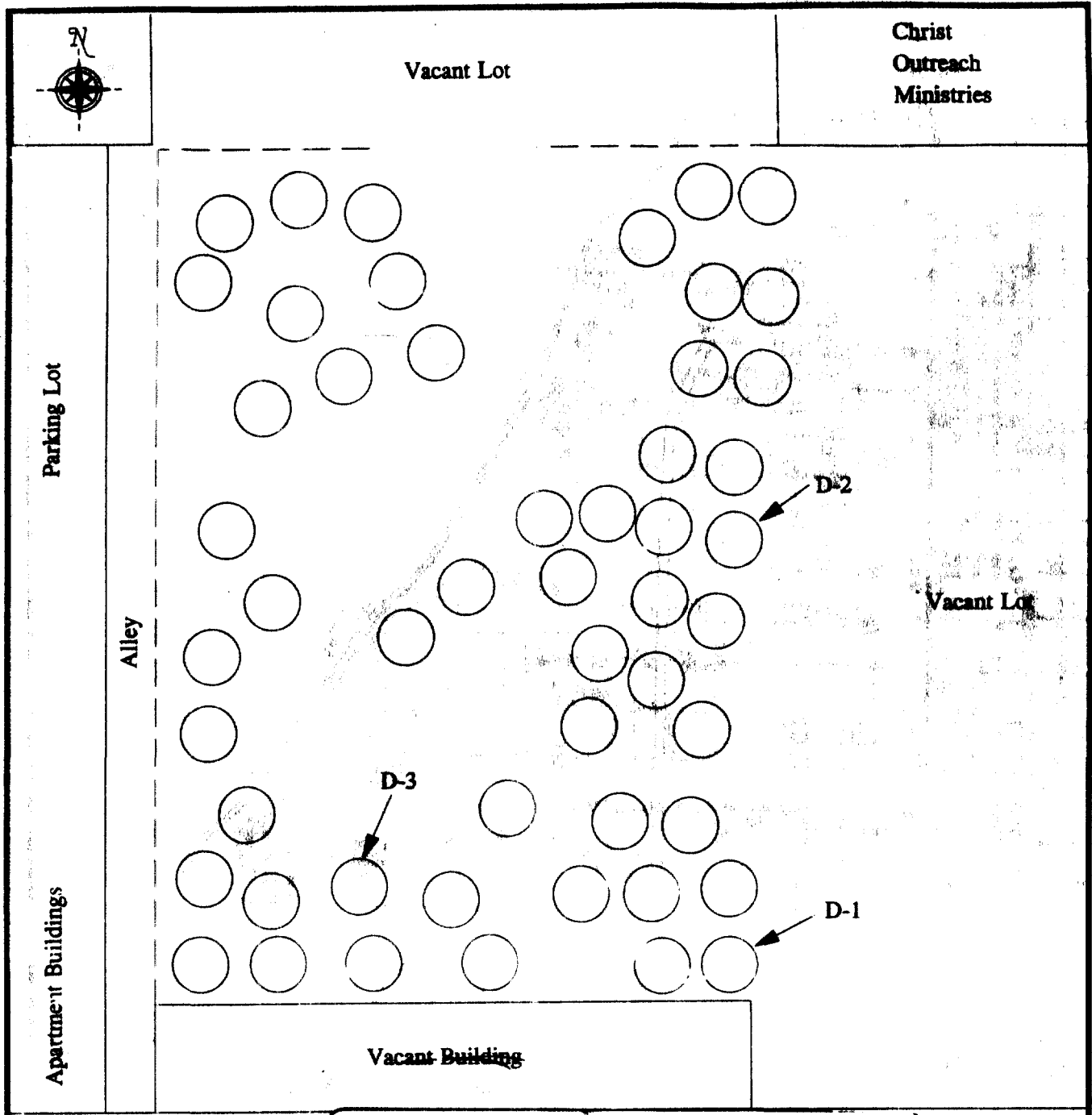
DATE

Jackson Park Landtriangle

SOURCE

DATE

REVISED



**Legend**

--- Fence

○ Drum

D-1 Sample Location

**EPA U.S. EPA Region 5**  
**EMERGENCY AND ENFORCEMENT RESPONSE BRANCH**

Site Features Map

TITLE

4310 S. Indiana Ave.

SITE

Chicago, IL

CITY

STATE

Ecology & Environment

SOURCE

FIGURE #

2

SCALE

NOT TO SCALE

PAN

DATE

1997

REVISED